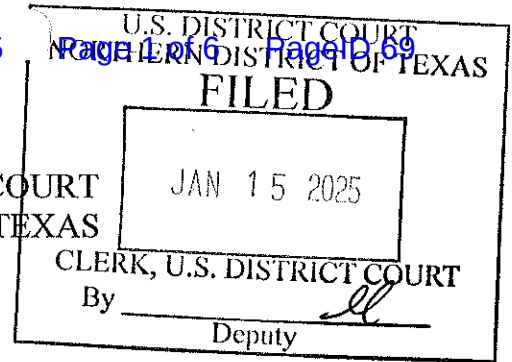


IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
SAN ANGELO DIVISION



UNITED STATES OF AMERICA

v.

CHRISTOPHER LYNN DRISKILL (01)

NO. 6:24-CR-00035-H-BU

(Supersedes indictment filed on 12/11/24)

SUPERSEDING INDICTMENT

The Grand Jury Charges:

Counts One - Two

Production of Child Pornography and Aiding and Abetting
(Violation of 18 U.S.C. § 2251(a) and 18 U.S.C. § 2(a))

Between a date unknown to the grand jury and on or about July 29, 2024, in the San Angelo Division of the Northern District of Texas, and elsewhere, **Christopher Lynn Driskill**, defendant, did attempt to, and did, employ, use, persuade, induce, coerce, and entice, "John Doe 1," a person under the age of eighteen years, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, as described below, knowing and having reason to know that such visual depiction would be transported and transmitted in interstate and foreign commerce, and which visual depiction was actually transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, and which visual depiction was produced using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer:

Count	Visual Depiction
1	A video approximately 12 seconds in duration of John Doe 1 with his penis exposed and an adult male orally copulating John Doe 1's penis while the defendant sits next to John Doe 1 masturbating himself.
2	A video approximately 32 seconds in duration of John Doe 1 with his penis exposed while the defendant is manually stimulating John Doe 1's penis. A second adult male is performing oral sex on the defendant. John Doe 1 is touching the exposed penis of a third adult male.

Each count in violation of Title 18, United States Code, Section 2251(a), Title 18, United States Code, Section 2(a), and *Pinkerton v. United States*, 328 U.S. 640 (1946).

Count Three

Production of Child Pornography and Aiding and Abetting
(Violation of 18 U.S.C. § 2251(a) and 18 U.S.C. § 2(a))

Between a date unknown to the grand jury and on or about November 27, 2024, in the San Angelo Division of the Northern District of Texas, and elsewhere, **Christopher Lynn Driskill**, defendant, did attempt to, and did, employ, use, persuade, induce, coerce, and entice, “John Doe 2,” a person under the age of eighteen years, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, as described below, knowing and having reason to know that such visual depiction would be transported and transmitted in interstate and foreign commerce, and which visual depiction was actually transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, and which visual depiction was produced using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer:

Count	Visual Depiction
3	A video approximately two seconds in duration of John Doe 2 laying on a bed with his eyes closed. Defendant places his exposed penis close to John Doe 2’s face.

Each count in violation of Title 18, United States Code, Section 2251(a), Title 18, United States Code, Section 2(a), and *Pinkerton v. United States*, 328 U.S. 640 (1946).

Forfeiture Notice
(18 U.S.C. § 2253)

Upon conviction of any offense alleged in this indictment and pursuant to 18 U.S.C. § 2253, defendant, **Christopher Lynn Driskill**, shall forfeit to the United States of America: (a) any visual depiction described in Section 2251, 2251A, 2252, 2252A, 2252B, or 2260 of Chapter 110, and any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped, or received in violation of Chapter 110; (b) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from any offense alleged in the Indictment; and (c) any property, real or personal, used or intended to be used to commit or to promote the commission of any offense alleged in the Indictment, and any property traceable to such property. The above-referenced property subject to forfeiture includes, but is not limited to, a white Apple iPhone with black case, a Samsung Cellular telephone, IMEI: 3529455788058840, a Hewlett Packard laptop computer, serial number CNU312BLGK, and an Oculus virtual reality headset.

If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or

- e. has been commingled with other property which cannot be divided without difficulty,


the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 18, United States Code, Section 2253(b) and by Title 28, United States Code, Section 2461(c).

A TRUE BILL:



FOREPERSON

LEIGHA SIMONTON
UNITED STATES ATTORNEY



MATTHEW L. TUSING
Assistant United States Attorney
Indiana State Bar No. 29526-49
500 Chestnut Street, Suite 601
Abilene, Texas 79602
Telephone: 325-271-6702
E-mail: matt.tusing@usdoj.gov

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
SAN ANGELO DIVISION

UNITED STATES OF AMERICA

v.

CHRISTOPHER LYNN DRISKILL (01)

INDICTMENT


COUNTS 1-3: PRODUCTION OF CHILD PORNOGRAPHY AND
AIDING AND ABETTING
Title 18, United States Code, Sections 2251(a) and 2.

FORFEITURE NOTICE

(3 COUNTS + FORFEITURE)

A true bill rendered:

Fort Worth

 Foreperson

Filed in open court this 15th day of January, A.D. 2025.

Clerk

DEFENDANT IN FEDERAL CUSTODY


UNITED STATES MAGISTRATE JUDGE